

3.5 CULTURAL AND TRIBAL CULTURAL RESOURCES

3.5 CULTURAL AND TRIBAL CULTURAL RESOURCES

This section presents the environmental setting and impact analysis for cultural and tribal cultural resources that would be affected by the proposed project. Appendix E presents maps of the cultural resource pedestrian survey areas and copies of communications with the California Native American Heritage Commission (NAHC) and local Native American tribes in the region of the proposed project.

3.5.1 Definitions

Cultural Resources

Cultural resources in the State of California are recognized as non-renewable resources that require management to assure their benefit to present and future Californians. Cultural resources are generally defined as prehistoric and historic sites, structures, landscapes, districts, and any other physical evidence associated with human activity considered important to a culture, a subculture, or a community for scientific, traditional, religious, or any other reason. Cultural resources in CEQA are commonly categorized as either historical resources or archaeological resources because CEQA requires an analysis of a project's effect on historical and archaeological resources.

Historical Resources

CEQA's provisions governing analysis of historical resources are set forth in PRC §21084.1 and CEQA Guidelines Section 15064.5(a)-(b). CEQA includes objects of historical significance in its definition of "environment" (PRC §21060.5). Per CEQA Guidelines Section 15064.5, the term "historical resources" is defined as:

1. A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (CRHR). This resource can be of either historic or prehistoric age.
2. A resource included in a local register of historical resources or identified as significant in a historical resources survey shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
3. Any object, building, structure, site area, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a cultural resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the CRHR, including the following:

3.5 CULTURAL AND TRIBAL CULTURAL RESOURCES

- a. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
- b. Is associated with the lives of persons important in our past;
- c. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- d. Has yielded, or may be likely to yield, information important in prehistory or history.

Archaeological Resources

CEQA includes detailed standards governing the analysis of impacts on archaeological resources (PRC §21083.2; CEQA Guidelines Section 15064.5[c]-[f]). If the lead agency determines that a project may have a significant effect on unique archaeological resources, the impact analysis must address those archaeological resources (PRC §21083.2[a]). An environmental document need not address effects on archaeological resources that are not unique (PRC §21083.2[a], [h]). The term “unique archaeological resource” under PRC §21083.2(g) refers to an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;
2. Has a special and particular quality, such as being the oldest of its type or the best available example of its type; or
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Tribal Cultural Resources

Assembly Bill (AB) 52, enacted in September 2014, recognizes that California Native American tribes have expertise with regards to their tribal history and practices. The bill established a new category of cultural resources known as tribal cultural resources to consider tribal cultural values when determining impacts on cultural resources. CEQA now requires an analysis of impacts on tribal cultural resources to consider Native American tribes’ knowledge and concerns. Tribal cultural resources have the following meaning under PRC §21074(a):

1. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
 - a. Included or determined to be eligible for inclusion in the CRHR; or
 - b. Included in a local register of historical resources as defined in PRC §5020.1(k).
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in PRC §5024.1(c). In applying the criteria set forth in PRC §5024.1(c), the lead agency shall consider the significance of the resource to a California Native American tribe.

3.5 CULTURAL AND TRIBAL CULTURAL RESOURCES

3. A cultural landscape that meets the criteria of PRC §21074(a) is also a tribal cultural resource if the landscape is geographically defined in terms of the size and scope.
4. A historical resource as described in PRC §21084.1, a unique archaeological resource as defined in PRC §21083.2, or a non-unique archaeological resource as defined in PRC §21083.2 may also be a tribal cultural resource if it meets the criteria of PRC §21074(a).

3.5.2 Environmental Setting

Regional Setting

Prehistory

Prehistory in California and the Sonoma area can be divided into three general time periods: the Paleo-Indian, Archaic, and Emergent Periods.

Paleo-Indian Period (circa 11,950 to 7,950 years before present [BP])

The earliest documented human occupation in California, the Paleo-Indian Period, was a time of variable climate, rising sea levels, and other broad-scale environmental changes. People lived in small, highly mobile groups, moving through broad geographic areas and leaving relatively meager archaeological remains. Archaeological sites dating to the Paleo-Indian period are rare in California; only a small number of sites dating to this period have been identified. The Paleo-Indian Period is recognized locally as the Post Pattern (Fredrickson 1974).

Archaic Period (7,950 to 950 years BP)

People gradually became more sedentary with the more stable climate of the Archaic Period. New groups entered the area, and regional cultural distinctions developed. The Archaic period has been divided into three subperiods (Lower, Middle, and Upper) based on changes in sociopolitical complexity, trade networks, population, and the introduction of new artifact types (Fredrickson 1974, Fredrickson 1994). Many of the archaeological sites in the North Coast Ranges were first used in the Middle and Upper Archaic periods when populations were increasing and groups moved into new areas to exploit a more diverse range of resources. By the Upper Archaic period, beginning around 2,450 years BP, mobility decreased. Subsistence strategies shifted to focus on intensive acorn processing and storage. Numerous small villages and the beginnings of a more complex society and economy characterized the end of this period.

Emergent Period (circa 950 years BP to the Historic period)

Social complexity further developed during the Emergent Period. Settlement patterns included large centrally-based villages where political leaders resided. Innovations associated with the period included the bow and arrow, small corner-notched points, and a diversity of beads and ornaments. Archaeological sites dating to this period are common throughout the North Coast Ranges and include sites of ritual significance, such as rock art; small resource-processing areas marked by stone-tool manufacturing debris (debitage) and flaked-stone tools or milling

3.5 CULTURAL AND TRIBAL CULTURAL RESOURCES

equipment (such as mortars and pestles); or moderate- to large-sized occupation sites marked by midden soils, dietary bone and shell, and a diversity of artifacts.

Ethnography

Many independent bands of Pomo Indians were located within the Counties of Mendocino, Lake, and Sonoma. The Pomo Indians are among the most widely studied and best-known groups in California. A considerable amount of literature is available describing their culture, customs, and ways of life. The voluminous anthropological literature reflects the work of numerous anthropologists and ethnographers affiliated with the University of California, as well as broader summaries and more focused studies.

This ethnographic summary provides some background of Pomo, a construction used by ethnographers to describe a series of highly similar but not identical cultures (Powers 1877). Pomo speakers never formed a single consolidated tribe but instead were organized within numerous politically independent bands. Seven distinct languages are recognized under the Pomo moniker (Barrett 1908). The combined speakers of the seven languages were the second most populous group in California, with an estimated pre-contact population of as many as 8,000 people (Kroeber 1925). Geographic divisions—including northern, central, southern, eastern, southeastern, northeastern, and southwestern or Kashaya—delineate these languages. These geographic divisions represent linguistic distributions, not cultural or political entities (Peri, Patterson and McMurray 1985).

Ethnographic literature indicates that at the time of historic contact, the project study area was within the territory of speakers of the southern Pomo dialect (Barrett 1908). The Southern Pomo language speakers were organized in several village communities; each controlled a definite territory, with families having regulatory rights to the resources within certain tracts of land (McLendon and Oswalt 1978).

Pomo subsistence strategies were well adapted to their environment. Several subsistence pursuits were undertaken, including fishing in lakes and streams, fowling in the marshes, hunting large and small mammals along the coastal prairie and in the uplands, and gathering a diverse range of plant species from various ecosystems. The Pomo subsisted mostly on deer and elk; rabbits and squirrels were important smaller animals that were hunted for food. A variety of marine resources were utilized including numerous species of shellfish, aquatic fish, and seaweed. Sea mammals, including harbor seal and sea otter, were hunted. As with many California Native American groups, acorn was a staple food.

Short-term stays at outlying camps and hamlets within the tribelet territory were made to augment locally obtained resources. Within the North Coast Ranges, networks of trade and exchange were highly developed to meet the various ceremonial, religious, economic, political, and/or subsistence needs of Pomo society (Loeb 1926). Intergroup relations between the Pomo and other neighbors were based on the active trade network along which goods flowed freely. Natural resources that the Clear Lake Basin offered included obsidian, magnesite, fish, and

3.5 CULTURAL AND TRIBAL CULTURAL RESOURCES

acorns. These items were traded for coastal resources such as sea mammal furs, seaweed, abalone shells, mussels, and other shellfish (Kroeber 1925).

The closest Pomo village site located near the project area is Kolo'ko, described in Samuel Barrett's work, the *Ethno-Geography of the Pomo Indians and Neighboring Tribes*, as being located at "a point about two miles east-southeast of Healdsburg" (Barrett 1908).

History

The lands encompassing the Healdsburg and Windsor areas were once part of the 48,800-acre Rancho Sotoyome Mexican land grant owned by Captain Henry Delano Fitch. Captain Fitch was an early settler in the San Diego area, a sea captain, and the brother-in-law of General Marino Guadalupe Vallejo. General Vallejo was a California military commander, politician, and rancher from Spain who performed military duties as an officer of Mexico. Fitch's relationship with Vallejo was a critical factor in obtaining the Rancho Sotoyome grant. The Rancho Sotoyome grant extended along the Russian River, encompassing the Alexander Valley and present-day Healdsburg.

In 1840, Captain Fitch hired Cyrus Alexander to seek out unclaimed lands north of San Francisco Bay that were suitable stock range for cattle. In exchange for finding proper ranching land and setting up a cattle ranch, Alexander would be awarded 2 square leagues of land and part of the ranch stock (Hoover, Rensch and Rensch 1970). Alexander headed north through the Napa Valley, by way of Mission Sonoma, until he struck the Russian River Valley. Alexander sent back a flattering report of the area to Captain Fitch, describing the numerous natural springs and expansive fields of wild oats and clover. Fitch petitioned the Mexican government, which officially granted an 8-league parcel on September 28, 1841. By that time, Alexander had been living and working on the ranch for over a year.

From 1840 to 1850, rancho activity centered on cattle raising. Cattle were purchased from Captain John Sutter, and grain crops such as Chilean wheat were supplied by Captain Fitch. During this time, Alexander established the Sotoyome Grist Mill, which became an important milling center in Sonoma County area in the late 1840s.

Alexander's contract ended in 1845, at which time he settled on his tract in what is now Alexander Valley. Morse Carson, the brother of Kit Carson, took over management of the Rancho Sotoyome grant (Hoover, Rensch and Rensch 1970). Captain Fitch died in San Diego in 1849. Shortly after Captain Fitch's death, his widow sold off portions of the land grant.

The town of Healdsburg was named after Harmon G. Heald in 1857. Heald settled in the area in 1846, established a trading post, and purchased a portion of the Rancho Sotoyome grant (Gudde 1998). Heald laid out the original town plot and donated several lots to schools, churches, and the main gathering plaza (Thompson 1877). In 1867, Heald's town was incorporated. The San Francisco and Northern Pacific Railroad reached Healdsburg in 1872.

In 1862, Hungarian Count Agoston Haraszthy arrived in Sonoma County with over 100,000 cuttings of prized grape varieties from France, Italy, and Spain and started growing

3.5 CULTURAL AND TRIBAL CULTURAL RESOURCES

wine grapes in the Sonoma Valley. Haraszthy is credited with first promoting the concept that fine table wines could be produced in Sonoma County as well as Europe. Today, wine cultivation and vineyards dominate the area.

Local Setting

Records Search

The California Historical Resources Inventory System (CHRIS) is maintained by the California Office of Historic Preservation. CHRIS is a database of cultural resources information, including sites listed or eligible for listing on the CRHR. CHRIS includes only information on historical resources that have been identified and evaluated through one of the programs that the California Office of Historic Preservation administers under the National Historic Preservation Act or the PRC. CHRIS includes data on:

- Resources evaluated in local government historical resource surveys partially funded through Certified Local Government grants or in surveys that local governments have submitted for inclusion in the statewide inventory;
- Resources evaluated and determinations of eligibility made in compliance with Section 106 of the National Historic Preservation Act;
- Resources evaluated for federal tax credit certifications; and
- Resources considered for listing in the National Register of Historic Places, CRHR, or as California State Landmarks or Points of Historical Interest.

PG&E requested that the Northwest Information Center conduct an archaeological records search during preparation of their PEA to identify previously recorded cultural resources within 0.25 mile of the project alignment. The Northwest Information Center provided the results of the records search to PG&E on March 17, 2011 and December 10, 2012. The records search identified 40 prior cultural resource surveys within 0.25 mile of the project alignment, and 20 of the surveys covered portions of the project study area. Cultural resources identified in the records search were comprised of lithic scatter, habitation debris and walls, ceramic scatter, a historic bridge, roads, and aging apple trees. All of these resources have been at least partially damaged by development or agricultural activities (i.e., pasturelands or vineyards). With the exception of CA-SON-1256¹, none of these resources were relocated (i.e., found) during the pedestrian survey effort (see Pedestrian Surveys, below).

Pedestrian Surveys

Six pedestrian surveys for cultural resources were conducted in the project area between 2011 and 2017. The pedestrian survey areas are shown on maps provided in Appendix E. Thirty-three cultural resources were identified during the pedestrian surveys conducted in 2011, 2012, 2015, 2016, and 2017. These resources include 24 historical sites or features, three prehistoric archaeological sites, and six prehistoric isolates. All of the resources identified during the

¹ The primary number (i.e., an alternate identification number) for site CA-SON-1256 is P-49-001179.

3.5 CULTURAL AND TRIBAL CULTURAL RESOURCES

surveys were evaluated for their eligibility for listing in the CRHR. All sites, except CA-SON-1256, were found to be ineligible for listing in the CRHR. Isolated finds (i.e., isolates) identified in Table 3.5-1 are not considered eligible for the CRHR because they lack research or data potential, meaning they do not contain information that would further our understanding of past activities in the area. Other resources are not eligible for listing in the CRHR because they are either (1) partially or entirely destroyed and thus do not meet any of the criteria to be considered a historically significant resource, or (2) do not have any substantial research potential and do not meet any of the criteria to be considered a historically significant resource.

Cultural resource site CA-SON-1256 is eligible for listing in the CRHR. The site qualifies as an archaeological resource under CEQA and appears to be eligible for listing in the CRHR under Criterion 4 for its potential to contribute to our knowledge of local history and prehistory (PG&E 2016).

Table 3.5-1 lists the cultural resource sites identified during pedestrian surveys conducted for the project and their eligibility for listing in the CRHR. The contractor, timing, and methodology for each pedestrian survey are provided below.

Table 3.5-1 Cultural Resource Sites Identified During Pedestrian Surveys

Site ID	Description	Eligible for Listing in CRHR?
CA-SON-1256	Prehistoric lithic scatter, habitation debris	Yes
P-49-003450	Historic fence	No
P-49-003451	Historic road	No
P-49-003452	Historic fence	No
P-49-003453	Historic fence	No
P-49-003454	Historic fence	No
P-49-003455	Historic fence	No
P-49-003456	Historic fence	No
P-49-003457	Historic fence, other	No
P-49-003458	Historic fence	No
P-49-003459	Historic fence	No
P-49-003460	Historic fence	No
P-49-003461	Historic fence	No
P-49-003462	Historic fence	No
P-49-003463	Historic fence	No
P-49-003464	Historic fence	No
P-49-003465	Historic Brooks Road	No

3.5 CULTURAL AND TRIBAL CULTURAL RESOURCES

Site ID	Description	Eligible for Listing in CRHR?
P-49-003466	Historic Chalk Hill Road	No
P-49-004349	Historic walls/fence	No
FF-1	Secondarily deposited sparse historic lithic scatter; possible prehistoric chert flake and obsidian nodule	No
FF-2	Historic rock alignment, probably a fence line	No
FF2017-1	Prehistoric isolate: basalt scraper	No
FF2017-2	Prehistoric isolate: basalt flake	No
FF2017-3	Possible prehistoric sparse lithic scatter	No
FF2017-4	Prehistoric isolate: obsidian flake	No
FF2017-5	Prehistoric isolate: basalt scraper	No
FF2017-6	Prehistoric sparse lithic scatter	No
FF2017-7	Historic fence	No
P-49-003469	Historic Fulton-Fitch Mountain 60-kV power line (8-mile section)	No
N/A	Historic Fulton Substation	No
N/A	Historic Fitch Mountain Substation	No
P-49-003467	Isolate: prehistoric single red Franciscan chert flake	No
P-49-003468	Isolate: prehistoric obsidian flake, obsidian Excelsior Foliate projectile point	No

Sources: (Tremaine & Associates, Inc. 2015, North Coast Resource Management 2011, Quercus Consultants 2016, PG&E 2016, Tremaine & Associates, Inc. 2017)

North Coast Resource Management (2011)

North Coast Resource Management conducted cultural resource surveys within a 150-foot buffer of the project alignment (300-foot-wide corridor) and within a 25-foot buffer of access routes on June 20 to 24, 2011 (North Coast Resource Management 2011). Field methods consisted of walking 15-meter linear transects anchored off the power line. Approximately 300 acres were surveyed with intensive/complete coverage. Global positioning system readings were taken for each cultural resource location. Poison oak, rattlesnakes, thick brush, and steep slopes hindered the survey effort. Ground surface visibility was generally poor, averaging less than 5 percent with rodent burrows, livestock trails, and dirt roads providing the best surface exposures. Crew members carried shovels and periodically scraped the ground surface to inspect for evidence of cultural materials.

Tremaine & Associates (2012 and 2015)

Tremaine & Associates performed additional cultural resource surveys for the proposed project on November 14 to 17, 2012, and May 8 to 10, 2015 (Tremaine & Associates, Inc. 2015). These surveys were conducted to cover project components added after the 2011 survey effort was completed. The crew walked parallel transects or zigzag patterns spaced approximately 10 to

3.5 CULTURAL AND TRIBAL CULTURAL RESOURCES

20 feet apart, where possible, with occasional diversions to visually examine items or locations of interest. Intensive pedestrian surveys were conducted within most survey areas; obstructions including poison oak, fencing, steep slopes, and ground cover density constrained the area surveyed. Ground visibility for both surveys ranged from poor to fair—obscured mostly by high grass and dense vegetation. In these areas, rodent burrows, road cuts, and other disturbances that exposed subsurface sediments were used to identify cultural materials.

Tremaine & Associates conducted presence-absence testing on June 18 and 19, 2015 for one resource (FF-1) identified during the 2012 survey effort (Tremaine & Associates, Inc. 2015). Presence-absence testing involved excavating one 1- by 1-meter shovel test pit, four 50- by 50-centimeter shovel test pits, and using three augers within the boundary of FF-1 and in adjacent, potentially sensitive project component locations. All excavated material was passed through a screen, and results were reported on level record forms and photo-documented.

TRC Solutions (2016)

TRC Solutions conducted a supplemental survey on March 16, 2016, and April 11 and 12, 2016 to survey alternative work areas not covered by previous survey efforts (TRC Solutions 2016). The surveyor walked transects in zigzag patterns spaced approximately 50 feet apart. Ground visibility was very poor—high grass and dense vegetation obscured ground visibility in most areas. Several areas were not accessible due to locked gates and high fences.

Quercus Consultants (2016)

Quercus Consultants conducted a historical resources inventory and evaluation of Fulton and Fitch Mountain Substations in 2016 (Quercus Consultants 2016). The evaluation included archival research at the California State Library History Room and PG&E records, and a field survey of the design and workmanship of the substations.

Tremaine & Associates (2017)

Tremaine & Associates conducted a supplemental survey to cover possible helicopter touch down areas, access roads, and work areas not covered by previous survey efforts (Tremaine & Associates, Inc. 2017). A sensitivity assessment was performed to determine the areas to be surveyed; ultimately 18 of the 43 areas identified were not surveyed due to low potential for cultural resources. Pedestrian surveys were conducted in the remaining areas. Ground visibility was very limited due to a covering of thick grass. The survey targeted areas with exposed soil assisted by the occasional clearing of small patches of grass to reveal the soil beneath.

Cultural Resources Sensitivity Analysis

The cultural resources study prepared by North Coast Resource Management (North Coast Resource Management 2011) included a geoarchaeological assessment. The purpose of the assessment was to determine the potential for buried archaeological resources within the project area, to create a model to predict their location(s), and to make recommendations based on these initial findings. Topography, geology, and soil type were used to distinguish areas dominated by erosion or slope processes from areas dominated by depositional processes. The

3.5 CULTURAL AND TRIBAL CULTURAL RESOURCES

approach targeted alluvial deposits because they are more likely to contain buried archaeological materials than other deposit types.

Examination of geologic and topographic maps in the project study area indicated that only a few areas exist where deposits of alluvium occur. These isolated alluvial deposits are situated along active streams such as Wright and Leslie Creeks. Most of the project area is situated along ridgelines and hill slopes that are considered to have a low possibility for supporting buried archaeological resources. The probability for encountering buried archaeological deposits within the project study area is low. Only the alluvial fans and streamside terrace deposits present adjacent to Wright Creek and Leslie Creek offer some potential for containing evidence of subsurface archaeological materials (North Coast Resource Management 2011).

Native American Coordination

Overview

PG&E and the CPUC coordinated with the NAHC and local Native American tribes in an effort to obtain information on tribal cultural resources in the project study area. PG&E coordinated with the NAHC and local tribes during development of their PEA between June 2011 and September 2015. Records of PG&E's written correspondence and phone notes are provided in Appendix D of their PEA. The CPUC coordinated with the NAHC and local tribes during preparation of this IS/MND. All CPUC correspondence with tribes can be found in Appendix E.

PG&E Coordination

On June 8, 2011, PG&E requested a Sacred Lands File search from the NAHC to determine if the NAHC has a record of any tribal cultural resources near the project study area. PG&E also requested contact information for local Native American tribes affiliated with the project study area. The NAHC responded to PG&E's requests on June 10, 2011, and provided a contact list for the tribes identified in Table 3.5-2. The NAHC also identified one potential tribal cultural resource near the project alignment, described as a Sacred Power Site, and suggested that PG&E contact the local tribes for more information about tribal cultural resources that may be in the project study area. The definition of the Sacred Power Site, its location, and features were not provided. It should be noted that Sacred Power Sites are often spiritual areas that may not have physical features that define it, such as remains or artifacts.

On June 10, 2011, PG&E sent letters to tribes identified by the NAHC requesting information on the Sacred Power Site, as well as any other cultural resources that may be located near the proposed project area. PG&E sent follow-up emails to the tribes on June 29, 2011. Only one tribe, the Federated Indians of Graton Rancheria, responded to PG&E's letters. In a letter dated July 18, 2011, the Federated Indians of Graton Rancheria stated that they did not believe the proposed project would adversely affect their cultural resources.

3.5 CULTURAL AND TRIBAL CULTURAL RESOURCES

Table 3.5-2 Tribes Contacted During Native American Consultation

Tribes Identified by NAHC	PG&E		CPUC	
	Contacted	Responded	Contacted	Responded
Cloverdale Rancheria of Pomo Indians ^a			●	
Coast Miwok, Pomo	●		●	
Dry Creek Rancheria of Pomo Indians	●		●	
Federated Indians of Graton Rancheria ^b	●	●	●	●
Lytton Rancheria of California	●		●	
Middletown Rancheria of Pomo Indians ^a			●	●
Mishewal-Wappo Tribe of Alexander Valley	●		●	
Pomo, Coast Miwok, Wappo	●		●	
Stewarts Point Rancheria	●		●	●

Notes:

- ^a These tribes were not on the list provided to PG&E by the NAHC in 2010 and therefore not contacted by PG&E.
- ^b The CPUC provided formal notice to the Federated Indians of Graton Rancheria as required by AB 52. No other tribes requested notice under AB 52 at the time PG&E's application was deemed complete.

On November 20, 2012, PG&E contacted the tribes a third time by email (and in some cases by phone and letter) after the scope of the proposed project was expanded to include reconductoring in the Southern Segment. PG&E sent follow-up emails to tribes on September 24, 2015.

The Federated Indians of Graton Rancheria responded to PG&E's follow-up email on October 21, 2015, requesting additional information regarding CA-SON-1256. PG&E provided a map showing the location of CA-SON-1256 relative to the proposed project area and did not receive a response from the tribe.

None of the tribes who were consulted responded with concerns or information about the Sacred Power Site. North Coast Resources Management surveyed the general area where the Sacred Power Site was described in 2011, and no evidence of cultural resources was found in the area (North Coast Resource Management 2011).

CPUC Coordination

The CPUC contacted the NAHC for an updated list of local Native American tribal groups on February 8, 2016. The NAHC responded to CPUC's request on February 23, 2016 and provided an updated contact list for the tribes identified in Table 3.5-2. The NAHC's response letter did not identify the Sacred Power Site that was described in the letter to PG&E in 2011.

On October 5, 2016, the CPUC mailed courtesy notification letters to the tribes identified by the NAHC, and requested any additional information the tribes may have related to sacred or

3.5 CULTURAL AND TRIBAL CULTURAL RESOURCES

traditional cultural places, tribal cultural resources, or tribal landscapes within or near the proposed project area. Courtesy notification letters were sent to all tribes except the Federated Indians of Graton Rancheria, who received a formal notification of tribal consultation under AB 52 (see below).

The Stewarts Point Rancheria Kashia Band of Pomo Indians responded to the CPUC’s request for additional information about cultural resources on October 11, 2016. They stated that the proposed project is outside of the aboriginal territory of the Rancheria and that they do not have any concerns or comments. The CPUC also received a response from the Middletown Rancheria on November 30, 2016, who had no specific comments about resources in the project area. No other tribes provided a response.

The Federated Indians of Graton Rancheria requested formal notification under AB 52 on September 24, 2015. If a tribe has requested formal notification under AB 52 of projects proposed within an area with which they are traditionally and culturally affiliated, the lead agency is required to provide the tribe with a formal notice within 14 days of deeming a project application complete. On May 10, 2016, the CPUC mailed a formal notification letter to the Federated Indians of Graton Rancheria after deeming PG&E’s application complete on April 29, 2016, as required by PRC §21080.3.1(d).

The Federated Indians of Graton Rancheria received the CPUC’s formal notification letter on May 11, 2015, which included an inquiry regarding the Sacred Power Site identified by the NAHC. The tribe replied to the notification letter on July 15, 2016 stating that they did not have any further comments, effectively ending the consultation process.

3.5.3 Impact Analysis

Summary of Impacts

Table 3.5-3 presents a summary of the CEQA significance criteria and impacts on cultural and tribal cultural resources that would occur during construction, operation, and maintenance of the proposed project.

Table 3.5-3 Summary of Proposed Project Impacts on Cultural and Tribal Cultural Resources

Would the proposed project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

3.5 CULTURAL AND TRIBAL CULTURAL RESOURCES

Would the proposed project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Cause a substantial adverse change in the significance of a tribal cultural resource as defined in PRC §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC §5020.1(k)?, or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence and with consideration of the significance of the resource to a California Native American tribe, to be significant pursuant to criteria set forth in subdivision (c) of PRC §5024.1?				

Impact Discussion

a) Would the proposed project cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5?	Significance Determination
	Less than significant with mitigation

Consistent with the definition of a historical resource under CEQA Guidelines Section 15064.5, impacts on CRHR-eligible historical and prehistorical resources identified in Table 3.5-1 are discussed under this significance criterion.

Construction

Known Resources

The pedestrian surveys identified several historical and prehistorical resources in the project study area, including roads, fences, PG&E electrical facilities, lithic scatter, and prehistoric isolates (refer to Table 3.5-1). The only known cultural resource in the project study area that is eligible for listing in the CRHR is CA-SON-1256, which contains prehistoric lithic scatter. Damage to CA-SON-1256 that would compromise its potential to contribute to our knowledge of prehistory could cause a substantial adverse change in a historical resource and would be a significant impact.

3.5 CULTURAL AND TRIBAL CULTURAL RESOURCES

APM CR-1 specifies monitoring requirements, equipment restrictions, and methods for marking a protective zone around CA-SON-1256. Equipment operating near the resource would be restricted to paved roadways and graveled areas and would only be allowed on bare ground within the site boundary if rubber mats were first placed over the work surfaces. A qualified archaeologist would also monitor all construction activities on bare ground. Impacts on CA-SON-1256 would be less than significant with implementation of APM CR-1.

Previously Undiscovered Resources

Construction could impact previously undiscovered CRHR-eligible resources. There is a low potential for encountering previously undiscovered historical resources during construction. Geoarchaeology analysis performed as part of the surveys found that the project survey area contains limited alluvial soil types that could represent a potential for sub-surface artifacts. The majority of the project impact area is comprised of steep slopes and rocky soils that represent a low potential for sub-surface resources (North Coast Resource Management 2011). If a buried resource was encountered and damaged, a significant impact could occur. Since the proposed poles are located outside of the areas of alluvial deposits and have very small disturbance footprints (less than 3 feet in diameter), the likelihood or probability of encountering and significantly damaging a resource is minimal and less than significant. Grading or other excavation in previously disturbed soils, also, is highly unlikely to result in disturbance of a previously undiscovered significant cultural resource. Impacts would be less than significant. Excavations greater than 3 feet in diameter, or grading that could occur at depths greater than 6 inches in previously undisturbed soils could potentially have a significant impact on a previously undiscovered cultural resource, although unlikely. If a previously undiscovered CRHR-eligible resource is encountered during construction activities, the resource could be inadvertently damaged. Damage to CRHR-eligible resources would be a significant impact.

PG&E would implement APM CR-2 to reduce impacts on previously undiscovered cultural resources, which would require construction activities to stop if a resource is found, and a qualified archaeologist to assess the resource. APM CR-2 is superseded by MM Cultural-1 because the APM does not address the need for cultural resource monitoring, or specify sufficient treatment measures should a resource be discovered. MM Cultural-1 requires monitoring for cultural resources during ground-disturbing activities for excavations greater than 3 feet in diameter, or for grading to depths greater than 6 inches in previously undisturbed soils, and procedures to follow if a previously undiscovered resource is encountered during construction, such as temporarily stopping or redirecting work activities within 100 feet of the discovery, and either avoiding the resource or implementing other mitigation such as data collection. MM Cultural-2 requires that all construction personnel are trained in the appropriate work practices to effectively implement the APMs and MMs, and to recognize basic signs of possible buried cultural and tribal cultural resources prior to beginning work on the project. MM Cultural-3 requires PG&E to conduct cultural resource surveys prior to construction within any areas not previously surveyed where project features require minor relocation prior to construction. If a resource is determined to be eligible for listing in the CRHR and cannot be avoided, MM Cultural-4 requires PG&E to perform data recovery of the resource. Impacts on

3.5 CULTURAL AND TRIBAL CULTURAL RESOURCES

previously undiscovered CRHR-eligible resources would be less than significant with implementation of MM Cultural-1, MM Cultural-2, MM Cultural-3, and MM Cultural-4.

Operation and Maintenance

Operation and maintenance activities associated with the proposed project would be conducted in areas that would be disturbed during project construction. Operation and maintenance activities would not differ from those currently conducted for the existing power line. Maintenance vehicles would use access routes, and all maintenance activities would be conducted within previously disturbed areas. There would be no potential to encounter and impact historical resources from project operation and maintenance. No impact would occur.

Required APMs and MMs: APM CR-1, MM Cultural-1, MM Cultural-2, MM Cultural-3, and MM Cultural-4

<p>b) Would the proposed project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?</p>	<p>Significance Determination</p>
	<p>Less than significant with mitigation</p>

Construction

No unique archaeological resources, as defined by CEQA Guidelines Section 15064.5, were found during cultural resource surveys for the proposed project. However, construction could impact previously undiscovered archaeological resources for the reasons described in Impact a) above. Damage to a unique archaeological resource would be a significant impact. MM Cultural-1, MM Cultural-2, MM Cultural-3, and MM Cultural-4 require cultural resource monitoring during construction, avoidance of resources where feasible, data recovery of resources if they cannot be avoided, and cultural resources training for all project personnel. Impacts would be less than significant with mitigation.

Operation and Maintenance

Operation and maintenance activities associated with the proposed project would be conducted in areas that would be disturbed during project construction. Operation and maintenance activities would not differ from those currently conducted for the existing power line. Maintenance vehicles would use access routes, and all maintenance activities would be conducted within previously disturbed areas. There would be no potential to encounter and impact archaeological resources from project operation and maintenance. No impact would occur.

Required APMs and MMs: MM Cultural-1, MM Cultural-2, MM Cultural-3, and MM Cultural-4

3.5 CULTURAL AND TRIBAL CULTURAL RESOURCES

c) Would the proposed project disturb any human remains, including those interred outside of formal cemeteries?	Significance Determination
	Less than significant

Construction

No recorded Native American or other human remains have been identified within or adjacent to the proposed project area; however, it is possible that unrecorded human remains could be discovered and inadvertently disturbed during construction. PG&E would be required to adhere to Health and Safety Code § 7050.5 and PRC §§ 5097.94, 5097.98, and 5097.99, which require procedures to halt work if human remains are discovered, notify the County Coroner to examine the remains, and to determine the appropriate treatment for potential prehistoric Native American remains through consultation with the Most Likely Descendent identified by the NAHC and the property owner. Impacts on previously unrecorded human remains would be less than significant.

Operation and Maintenance

Operation and maintenance activities associated with the proposed project would be conducted in areas that would be disturbed during project construction. Operation and maintenance activities would not differ from those currently conducted for the existing power line. Maintenance vehicles would use access routes, and all maintenance activities would be conducted within previously disturbed areas. There would be no potential to encounter and impact human remains from project operation and maintenance. No impact would occur.

Required APMs and MMs: None

d) Would the proposed project cause a substantial adverse change in the significance of a tribal cultural resource as defined in PRC §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC §5020.1(k)?, or ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence and with consideration of the significance of the resource to a California Native American tribe, to be significant pursuant to criteria set forth in subdivision (c) of PRC §5024.1?	Significance Determination
	Less than significant with mitigation

Construction

One potential tribal cultural resource, described as a Sacred Power Site, was identified by the NAHC in the project study area. None of the tribes contacted by PG&E or the CPUC identified any tribal cultural resources within the project study area, including the Sacred Power Site (refer to Section 3.5.2). No evidence of any physical tribal cultural resource was found during the pedestrian survey effort; however, there is a relatively high likelihood of encountering

3.5 CULTURAL AND TRIBAL CULTURAL RESOURCES

previously undiscovered tribal cultural resources for the reasons described in Impact a) above. If a resource is encountered during ground-disturbing activities that shows signs of prehistoric Native American culture, it could be a significant tribal cultural resource. Damage to a significant tribal cultural resource, as defined in PRC §5024.1, would be a significant impact. Sacred Power Sites may be spiritual locations and may not be associated with physical artifacts. These sites can be impacted by the presence of an activity or action. However, given that none of the tribes contacted by PG&E and the CPUC identified or commented on a Sacred Power Site in the area, and that the project would be located along an existing power line, either the proposed project likely does not fall within a Sacred Power Site, or the project would not affect a Sacred Power Site.

PG&E would implement APM CR-2 to mitigate impacts on previously undiscovered tribal cultural resources, which requires construction activities to stop if a resource is found, and a qualified archaeologist to assess the resource; however, APM CR-2 is superseded by MM Cultural-1 because the APM does not address tribal cultural resources or the need for cultural resource monitoring. MM Cultural-1 requires specific methods for archaeological monitoring during ground-disturbing construction activities, and procedures to follow if a previously undiscovered resource is encountered during construction. These procedures include temporarily stopping or redirecting work activities within 100 feet of the discovery and either avoiding the resource or implementing other mitigation such as data collection. MM Cultural-1 also requires PG&E to designate a Native American specialist responsible for evaluating whether any new cultural resources found during construction are significant tribal cultural resources as defined in PRC §21074(a), and implementing coordination procedures with the CPUC and local tribes identified by the NAHC. MM Cultural-2 requires that all construction personnel are trained to recognize possible tribal cultural resources prior to beginning work on the project. MM Cultural-3 requires PG&E to conduct cultural resource surveys prior to construction within any areas not previously surveyed. If a resource is determined to be significant and cannot be avoided, MM Cultural-4 requires PG&E to perform data recovery of the resource. Impacts on previously undiscovered tribal cultural resources would be less than significant with implementation of MM Cultural-1, MM Cultural-2, MM Cultural-3, and MM Cultural-4.

Operation and Maintenance

Operation and maintenance activities associated with the proposed project would be conducted in areas that would be disturbed during project construction. Operation and maintenance activities would not differ from those currently conducted for the existing power line. Maintenance vehicles would use access routes, and all maintenance activities would be conducted within previously disturbed areas. There would be no potential to encounter any impact tribal cultural resources from project operation and maintenance. No impact would occur.

Required APMs and MMs: MM Cultural-1, MM Cultural-2, MM Cultural-3, and MM Cultural-4

3.5 CULTURAL AND TRIBAL CULTURAL RESOURCES

3.5.4 Required Applicant Proposed Measures and Mitigation Measures

APM CR-1: Avoid Cultural Resources

Archaeological resource CA-SON-1256 shall be avoided by restricting equipment and vehicle access to paved or graveled surfaces along the roadway. If travel off paved or graveled surface is necessary within the site boundary for any reason, PG&E shall place rubber mats across the site surface to protect against any inadvertent damage to the site by driving on the surface. PG&E shall also establish a protection zone by flagging the site boundary along the roadway with exclusion fencing to ensure that no vehicles will inadvertently enter the site boundary without the above-mentioned protection measures. A qualified archaeologist shall monitor all construction activity on unpaved surfaces within the resource site.

Applicable Locations: Confidential CA-SON-1256 site location disclosed to monitoring personnel

Performance Standards and Timing:

- **Before Construction:** N/A
- **During Construction:** (1) Equipment within the site boundary is restricted to paved or gravel surfaces, or on rubber mats if work occurs on bare ground, and (2) Monitoring occurs if work occurs on bare ground within the site boundary
- **After Construction:** N/A

MM Cultural-1: Archaeological Monitoring and Cultural Resource Discoveries (Supersedes APM CR-2)

Archaeological Monitoring for Previously Undiscovered Cultural Resources. A CPUC-approved cultural resources specialist/archaeologist shall be onsite to spot-check the initial 10 feet of pole hole augering greater than 3 feet in diameter (limited to TSPs) and grading in previously undisturbed areas greater than 6 inches in depth. If qualifying excavations occur simultaneously at multiple locations, the cultural resources specialist/archaeologist shall spot-check each location throughout the workday until ground-disturbing activities are complete at each location. If signs of a resource are encountered during spot-checking, monitoring shall become full time until ground-disturbing activities are complete in the work area. The cultural resources specialist/archaeologist must have experience with California/regional history and local Native American history, traditions, and customs and shall meet the US Secretary of Interior Professional Qualifications Standards as published in 36 CFR Part 61. The cultural resources specialist/archaeologist shall be responsible for evaluating any cultural resources discovered during construction for signs of prehistoric Native American culture and for coordinating outreach efforts with the NAHC and local Native American tribes if potential tribal cultural resources are found. If they request to participate, Native American tribes shall be given the opportunity to monitor construction activities within 100 feet of identified prehistoric Native American resources or tribal cultural resources. Any tribal monitoring activities should be coordinated with the cultural resources specialist/archaeologist.

Cultural Resource Discoveries. If signs of a previously undiscovered cultural resource are encountered, all construction activities within 100 feet of the resource site shall halt, and the cultural resources specialist/archaeologist shall be contacted to implement required evaluation and treatment procedures, described below. Construction supervisors and workers shall be informed that the site is off-limits, and if necessary, the cultural resources specialist/archaeologist shall install flagging to designate the limits of the site.

If the resource is located within Caltrans right-of-way, PG&E shall also immediately notify the Caltrans Office of Cultural Resources Studies, District 4 of the discovery.

The cultural resources specialist/archaeologist shall evaluate the resource and determine whether it is (1) a historic resource as defined in CEQA Guidelines Section 15064.5 and thus eligible for listing in the CRHR, (2) a unique archaeological resource as defined in PRC §21083.2(g), or (3) a potential tribal cultural resource as defined in PRC §21074(a). If it is determined that the resource does not meet any of these criteria, work may resume in the area, and a summary of the discovery findings and evaluation conclusions shall be documented and provided to the CPUC with Weekly Compliance Reports. The

3.5 CULTURAL AND TRIBAL CULTURAL RESOURCES

methods and results of the evaluation shall also be documented in a professional-level technical report to be filed with the California Historical Resources Information System (CHRIS). If the resource meets any of the criteria listed above and is therefore considered a significant resource under CEQA, work shall remain halted at an appropriate distance from the find, and the cultural resources specialist/archaeologist shall consult with the CPUC regarding methods to ensure that no substantial adverse change would occur to the significance of the resource pursuant to CEQA Guidelines Section 15064.5(b).

If the cultural resources specialist/archaeologist determines that the resource could be a tribal cultural resource, he or she shall, within 48 hours of the discovery, notify each Native American tribe identified by the NAHC to be traditionally and culturally affiliated with the geographic area of the project site of the discovery. The responding tribes shall be given an opportunity to participate in determining the appropriate mitigation methods in consultation with the CPUC. The CPUC shall request that the tribes respond to the notifications within 3 days.

Preservation in place (i.e., avoidance) is the preferred method of mitigation for cultural and tribal cultural resources and shall be required to mitigate impacts on previously undiscovered resources. Other methods of mitigation shall only be used if the cultural resources specialist/archaeologist, in coordination with the CPUC, determines that the method would provide equivalent or superior mitigation of the impacts on the resource. The alternative methods of mitigation may include data recovery and documentation of the information contained in the site to answer questions about local history and prehistory (see MM Cultural-4). Work in the area may commence upon completion of treatment, as approved by the CPUC.

Applicable Locations: All project areas

Performance Standards and Timing:

- **Before Construction:** Adequate personnel are identified for the cultural resources specialist/archaeologist
- **During Construction:** (1) Work within 100 feet of discovered resources stops, (2) The required personnel and agencies are notified, (3) Adequate reporting and documentation occurs, (4) Significant resources are completely avoided or mitigated from impacts, and (5) Work only resumes near the resource after required procedures are complete, to the satisfaction of CPUC.
- **After Construction:** N/A

MM Cultural-2: Cultural Resource Training

All project personnel shall receive adequate cultural resource training prior to working on the project. The training shall address appropriate work practices necessary to effectively implement project requirements, including APMs and mitigation measures, for historical resources, archaeological resources, tribal cultural resources, and human remains. The training shall address the potential for exposing subsurface resources, basic signs of a potential resource, and required procedures if a potential resource is identified consistent with the procedures set forth in MM Cultural-1, MM Cultural-3, MM Cultural-4, and all procedures required under Health and Safety Code § 7050.5 and PRC §§ 5097.94, 5097.98, and 5097.99 for the discovery of human remains. The training shall also identify requirements for working near archaeological resource site CA-SON-1256, as defined in APM CR-1.

PG&E shall submit the cultural resource training material to the CPUC for approval no less than 30 days before construction, and it may be submitted in conjunction with the general Worker Environmental Training Program for the project.

Applicable Locations: N/A

Performance Standards and Timing:

- **Before Construction:** The cultural resource training material is submitted to the CPUC at least 30 days before construction
- **During Construction:** Workers receive the CPUC-approved cultural resource training prior to working on the site
- **After Construction:** N/A

3.5 CULTURAL AND TRIBAL CULTURAL RESOURCES

MM Cultural-3: Pre-Construction Cultural and Tribal Cultural Resource Surveys

Prior to construction at any project area, PG&E shall compare areas of proposed ground disturbance with the project geographic information system (GIS) layers that show cultural resource survey areas. PG&E shall verify that proposed ground disturbance areas have been surveyed for cultural resources. If the areas of proposed ground disturbance have been surveyed (and no known resources are located in the area), then no additional measures are required and construction may commence.

If the areas have not been surveyed (such as due to minor relocation of a project feature or access road), no ground disturbance shall be permitted prior to completion of surveys by a CPUC-approved cultural resource specialist/archaeologist. If a resource is found, it shall be avoided. If it cannot be avoided, PG&E shall follow the procedures in MM Cultural-1.

Applicable Locations: Work areas not previously surveyed for cultural and tribal cultural resources

Performance Standards and Timing:

- **Before Construction:** Work areas not previously surveyed for cultural resources are surveyed prior to construction
- **During Construction:** Any resources found during pre-construction surveys are evaluated and, if necessary, treated
- **After Construction:** N/A

MM Cultural-4: Data Recovery

If a CRHR-eligible, unique archaeological, or tribal cultural resource cannot be completely avoided or protected from direct project impacts, data recovery investigations shall be required to reduce adverse effects to the characteristics of each site that contribute to its significance or CRHR-eligibility. For sites eligible under Criterion (d), significant data shall be recovered through excavation and analysis. For sites eligible under Criteria (a), (b), or (c), data recovery may include historical documentation, photography, collection of oral histories, architectural or engineering documentation, preparation of a scholarly work, or some form of public awareness or interpretation. Data gathered during the evaluation-phase studies shall guide plans and data thresholds for data recovery. Treatment shall be based on the resource's research potential beyond that realized during resource recordation and evaluation studies.

If data recovery occurs, PG&E shall prepare a Research and Data Recovery Plan for each individual site where data recovery is necessary. The plans shall be submitted to the CPUC for approval, and data recovery procedures shall not occur at the sites until authorized by the CPUC. The plan shall describe the specific procedures that would be implemented during data recovery, as appropriate for the type of resource. Sampling for data recovery excavations shall follow standard statistical sampling methods, but sampling shall be confined to the direct impact area.

The methods and results of evaluation and data recovery work at an archaeological find shall be documented in a professional-level technical report to be filed with CHRIS, a copy of which shall be submitted to the CPUC. Artifacts collected during data recovery shall be cataloged and permanently curated with an appropriate institution.

Applicable Locations: Any work areas where a previously undiscovered resource is identified

Performance Standards and Timing:

- **Before Construction:** N/A
- **During Construction:** (1) Research and Data Recovery Plans are submitted to the CPUC for approval, (2) Data recovery methods are implemented after CPUC approval, (3) Field Closure Reports are filed with the appropriate entities, (4) Professional-level technical reports are filed with CHRIS, and (5) Recovered artifacts are cataloged and submitted to appropriate institutions
- **After Construction:** N/A

3.5 CULTURAL AND TRIBAL CULTURAL RESOURCES

3.5.5 References

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